

Singleton Council comments on HTC Submissions Report

7.4.1. Workforce accommodation

EnergyCo's response states that *"the temporary worker accommodation has been removed from the Gouldsville Road construction support site."*

This is a significant change from the exhibited project.

This means the issues SC raised technically disappear with regards to workforce accommodation.

Singleton Council notes the amendment.

7.4.2 Engagement Commitments

EnergyCo's engagement response is very weak compared to what SC requested.

SC requested:

- technical workshops
- traffic management discussions
- haulage route coordination
- road condition monitoring

EnergyCo response is that they will meet with SC at least twice during upcoming phases. For a project the scale of the HTP, two meetings appear to be minimal.

Singleton Council is seeking a condition of consent that requires the Applicant to prepare a detailed Stakeholder Engagement Plan. This Plan should include, but not be limited to, details on the timing of engagement, reasons for the engagement, expected outcomes and a mechanism that demonstrates the Applicant is responding to engagement feedback.

Singleton Council is seeking a condition of consent that requires the Applicant to stand up and maintain a Community Consultative Committee (noting the historical Regional Reference Group) that is targeted at providing the community within each local government area. The Committee must operate in accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects (or equivalent) for the life of the development or a timeframe agreed by the Planning Secretary.

7.4.3 Biodiversity

SC highlighted major biodiversity impacts, including:

- ~762 ha of native vegetation affected
- ~546 ha cleared
- 207 ha of threatened ecological communities
- significant habitat in the Singleton Military Area

SC asked for:

- biodiversity offsets
- a biodiversity management plan

- a connectivity strategy
- ongoing collaboration.

EnergyCo's response contains three commitments only:

1. Biodiversity Management Plan (BMP) - to guide mitigation measures.
2. Connectivity Strategy - to address habitat fragmentation.
3. Biodiversity Offsets via a SODA - Offsets will be handled through a Strategic Offset Delivery Agreement.

Key Risks:

1. SC Has No Control Over Offsets

Offsets will be handled by NSW Department of Climate Change, Energy, the Environment and Water.

That means:

- offsets may not occur in Singleton LGA
- offsets may be delivered years later
- offsets may not address local fragmentation

This is common with SODA agreements.

SC loses leverage over where biodiversity outcomes occur.

2. Connectivity Strategy Has No Commitments

EnergyCo states a connectivity strategy will be developed, but there is no requirement that it must:

- restore habitat corridors
- fund biodiversity projects
- work with SC land.

It is essentially a planning document only.

3. Extremely Large Vegetation Loss

The scale is substantial - 546 ha cleared

Response does not commit to avoidance refinements or further design changes.

Singleton Council is seeking a condition of consent that requires the Applicant to work with council on the development of the Strategic Offsets Delivery Agreement, to ensure that the proposed offset strategy meets the requirements set out in Council's adopted Biodiversity Conservation Policy.

7.4.4 Aboriginal Heritage

SC noted:

- 32 Aboriginal sites identified
- 14 likely to be directly impacted

SC asked for:

- meaningful consultation with Registered Aboriginal Parties
- an Aboriginal Cultural Heritage Management Plan
- protection of cultural landscapes and view lines.

EnergyCo commits to preparing an Aboriginal Cultural Heritage Management Plan with RAP consultation.

It will include:

- archaeological mitigation
- unexpected finds procedures
- cultural landscape management.

Key Risks:

1. Site Impacts Still Occur

EnergyCo acknowledges that direct impacts will still occur. The management plan only addresses how impacts are managed, not avoided.

2. Post-Approval Management

The key document (the heritage plan) will be prepared after approval.

This means:

- details are not assessed during the EIS
- RAP consultation happens after approval

Common issue in major infrastructure approvals.

3. “Where Practicable” Language

“where possible” and “where practicable” language is used. These phrases limit obligations and allow flexibility during construction.

Singleton Council notes the proposed mitigation measures.

7.4.5 Landscape and Visual

SC noted impacts to:

- Wollombi Brook
- Broke
- Maison Dieu
- Long Point
- Mount Thorley

SC requested:

- vegetation screening
- sensitive lighting
- tailored screening for affected dwellings.

EnergyCo commits to:

1. Landscape & Visual Impact Management Plan
2. Lighting designed to AS 4282-2019 Control of the Obtrusive Effects of Outdoor Lighting
3. Vegetation screening for properties with moderate impacts
4. Investigating tower height reductions near Broke.

Key Risks

1. Screening Is Not Guaranteed

Vegetation screening is only required for properties assessed with moderate or higher impacts, but visual impact ratings are subjective & screening may take years to grow.

2. Tower Height Reductions Are Only Investigated

EnergyCo says it will investigate opportunities - this is not a commitment.

3. Construction Impacts Underplayed

The management plan mainly focuses on operational impacts.

Construction impacts may still be significant including:

- lighting
- crane visibility
- clearing scars

Overall Strategic Assessment for Singleton SC

Positive Elements

- Biodiversity plans required.
- RAP consultation acknowledged.
- Screening and lighting controls proposed.

Key Risks

1. Heavy Reliance on Post-Approval Plans

Most mitigation is deferred to:

- management plans
- strategies
- agreements

These occur after project approval.

2. Limited Binding Outcomes

EnergyCo commitments mostly say “prepare”, “develop” and “investigate” rather than deliver specific outcomes.

3. Offset Delivery Outside the LGA

Through the SODA mechanism, biodiversity offsets may occur anywhere in NSW, meaning Singleton could experience net biodiversity loss locally.

Singleton Council notes the proposed mitigation measures, noting Council's request for a condition of consent in relation to the Strategic Offset Delivery Agreement.

7.4.6 Traffic and Transport

1. Stringing Across Major Roads

Key roads affected include:

- Putty Road
- Cessnock Road
- Wollombi Road
- Lemington Road
- Gouldsville Road

SC asked that stringing works avoid mine shift change periods.

EnergyCo says traffic controls will:

- be confirmed during detailed design
- occur under Road Occupancy Licences
- occur "where feasible" outside peak periods

EnergyCo did not commit to avoiding mine shift periods.

The wording "where feasible outside peak periods" means the contractor can still schedule works during peak mine traffic if needed. This could create safety issues around heavy vehicle congestion.

2. Local Road Access (Lemington & Gouldsville Roads)

SC asked for consultation with HVO, residents and SC.

EnergyCo responded that traffic controls will be detailed in the TMP.

As the TMP will be prepared after approval, SC will not see the actual arrangements during the EIS process.

3. Road Upgrades and Dilapidation

EnergyCo states:

- intersection upgrades will occur before construction traffic uses them
- dilapidation surveys will occur
- remediation works will occur
- all works are "at no cost to Singleton SC."

EnergyCo states that regional roads have been built to accommodate medium to high volumes of traffic. The increase in vehicles due to construction traffic would have a negligible to minor impact on pavement condition, and dilapidation surveys and routine inspections of regional roads is not proposed.

Regional roads often include:

- heavy haulage routes
- high truck volumes during construction.

If these roads deteriorate, SC will struggle to prove construction damage without baseline surveys.

4. Oversize Overmass (OSOM) Vehicles

Five OSOM movements will occur through the LGA to Bayswater South. They rely on the Singleton Bypass opening first.

EnergyCo's position is that If the Bypass is not open EnergyCo will consult with relevant road authorities – this is not a commitment to avoid the Singleton CBD.

SC requested confirmation that OSOM vehicles would not pass through town - EnergyCo have not provided that confirmation.

The main freight route mentioned is the New England Highway which runs through Singleton town.

Singleton Council is seeking a condition of consent that prevents all heavy vehicle movements from using Maitland Road, George Street, Kelso Street and John Street at any time.

Singleton Council is seeking the following conditions of consent that require the Applicant to:

1. Road Maintenance

- a) prepare a pre-dilapidation survey of any local and/or regional road used by the Project within the Singleton LGA.***
- b) prepare a post-dilapidation survey of any local and/or regional road used by the Project within every 5 years thereafter, or at intervals agreed to with the relevant roads authority, for the life of the development; and to the satisfaction of the applicable roads authority.***
- c) following completion of a post-dilapidation survey prepared under (b), where development-related damage is identified and rectification works are required, the Applicant is to notify the applicable roads authority of the required works and seek an independent costing associated with repairs. Upon acceptance of the independent costings and receipt of invoice from Council, the Applicant is to pay the amount required to undertake the repairs associated only with the development-related damage and Council is to complete the repairs.***
- d) If there is a dispute about the scope of any remedial works or the implementation of the works, then either party may refer the matter to the Planning Secretary for resolution.***

2. Traffic Management Plan

The Applicant must prepare a Traffic Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:

- (a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;***
- (b) be prepared in consultation with TfNSW and Council;***

- (c) include details of all transport routes and traffic types to be used for development-related traffic;**
- (d) include details of flood warning signage, including flood depth indicators, in the vicinity of any road works within or adjacent to any river, creek or stream;**
- (e) include a protocol for undertaking pre and post-dilapidation surveys and repairing any roads identified in the dilapidation surveys to have been damaged during construction and/or decommissioning works;**
- (f) include details of the measures to be implemented to minimise traffic safety issues and disruption to local road users during construction, operation and decommissioning phases of the development, including:**
 - a. temporary traffic controls, including detours and signage (where relevant);**
 - b. notifying the local community about development-related traffic impacts;**
 - c. minimising potential for conflict with school buses and stock movements;**
 - d. access and car parking arrangements;**
 - e. staggering shift changes with other major projects, including to minimise impacts during AM and PM peak traffic periods;**
 - f. responding to any emergency repair requirements or maintenance during construction and/or decommissioning.**
- (g) If the construction and/or decommissioning of the development is to be staged, the obligations in this condition apply to each stage of construction and/or decommissioning.**
- (h) The Applicant must not commence construction activities associated with the Hunter Transmission Project until the Traffic Management Plan is approved by the Planning Secretary.**
- (i) The Applicant must implement the Traffic Management Plan as approved by the Planning Secretary.**

7.4.7 Land Use and Property

Scale of Private Land Impacts

Within the project area:

- 125 private landholdings
- 7 landowners requested whole property acquisition
- large transmission easement
- impacts within the Singleton Military Area

EnergyCo Commitments

EnergyCo proposes:

- property management plans
- reinstatement after construction
- consultation with landowners
- compensation under the Land Acquisition (Just Terms Compensation) Act 1991

These are standard mechanisms.

Key Risks

The response does not address cumulative land use impacts, such as:

- long-term rural landscape change
- constraints on rural subdivision
- interaction with other energy infrastructure.

The phrase used repeatedly is “where practical” - this allows flexibility in how land is restored.

Singleton Council notes the proposed mitigation measures.

7.4.8 Agriculture

Singleton LGA contains 98% of agricultural land affected by the project

SC highlighted impacts to:

- grazing
- vineyards
- equine industries.

The region also contains Biophysical Strategic Agricultural Land (BSAL).

EnergyCo states it reduced BSAL impacts from 213 ha → 190 ha

High capability land reduced from 182 ha → 160 ha

This is a relatively small reduction.

Mitigation Measures Proposed are that EnergyCo will prepare:

- property management plans
- rehabilitation management plan
- biosecurity management plan
- erosion and sediment controls.

Key Risks

1. Aerial Spraying Disruption

Transmission lines can affect:

- crop dusting
- aerial fertiliser spreading.

EnergyCo acknowledges this but only says impacts will be addressed through property plans. This may create ongoing operational constraints for farms.

2. Biosecurity Risks

EnergyCo will develop a biosecurity plan later, but the Hunter Valley has significant vineyard biosecurity sensitivities.

Without strict controls, machinery movement can spread weeds and soil pathogens.

3. Agricultural Fragmentation

Transmission lines can divide paddocks and affect:

- irrigation layout
- machinery movement
- grazing rotations.

EnergyCo says impacts will be minimised “as far as practicable.” - this is non-binding language.

Singleton Council notes the proposed mitigation measures.

7.4.9 Social

1. Community Benefits

SC strongly pushed for clear benefit commitments.

SC policies referenced include:

- Singleton Planning Agreements Policy 2023
- Singleton Local Infrastructure Contributions Plan 2025

These set expectations around 1 - 1.5% of project value for community benefits.

EnergyCo states:

- consultation on benefits will start in 2026
- benefits will follow the Regional Communities Consultation Guide 2025

Key Risks

EnergyCo does not commit to any funding amount.

The benefit scheme is undefined, post-approval and region-wide.

2. Social Impact Management Plan (SIMP)

EnergyCo will prepare a SIMP covering:

- community engagement
- monitoring impacts
- mitigation measures.

This is a post-approval document.

3. Worker Conduct

EnergyCo commits to:

- worker code of conduct
- zero tolerance for anti-social behaviour.

The worker camp in Singleton has been removed.

Singleton Council is seeking a condition of consent that requires the Applicant to either:

- (a) Enter into a Planning Agreement with Council in accordance with clause 7.2 of the EP&A Act and Council's adopted Planning Agreements Policy; or**
(b) Apply the section 7.12 local contributions rate as set out in the adopted Singleton Local Infrastructure Contributions Plan.

7.4.10 Historic Heritage

1. Visual impacts increased but no new mitigation

The amendment report acknowledges visual impacts to the Brick farmhouse (I142) increase from low to moderate due to the corridor moving closer.

However:

- No additional mitigation measures are proposed
- The response states "existing mitigation measures would be implemented"

Key Risks

- Increased visual impact on a heritage item with no landscape screening or design mitigation
- Council may lose leverage to require:
 - vegetation screening
 - micro-siting of poles
 - heritage interpretation or offsets

No commitment to:

- reduce visual intrusion
- relocate poles
- additional heritage impact assessment at detailed design.

2. Heritage Management Plan only requires consultation

The Historic Heritage Management Plan (HHMP) will be developed in consultation with Heritage NSW, NPWS and Council's Heritage Advisory Committee.

The report does not require Council approval.

Key Risks

Council's role becomes advisory only, meaning:

- EnergyCo can consult but not adopt Council recommendations
- Council cannot enforce heritage protections later

Council seeks wording such as *"to the satisfaction of Council"* or *"in consultation with and approved by the consent authority after consultation with Council."*

3. Wishing Well plaque commitment weak

The wording states the plaque will be installed *"as close as possible/practicable to the water source"*

Key Risks

“Practicable” gives EnergyCo flexibility to relocate the plaque away from the heritage feature if construction constraints arise.

Also:

- no timing commitment
- no heritage interpretation plan
- no guarantee the water source itself is protected.

Singleton Council notes the proposed mitigation measures.

7.4.11 Noise and Vibration

1. Operational noise mitigation only if exceedances occur

The report states “*operational monitoring will confirm the need for mitigation in the event of exceedances.*”

Key Risks

This means:

- mitigation occurs after impacts occur
- affected landowners could experience noise first.

Typical best practice is:

- predictive mitigation during design
- not reactive mitigation.

2. “Worst case scenario” argument

EnergyCo states “*the EIS noise assessment represents a worst-case scenario prior to mitigation.*”

Key Risks

This phrase may downplay predicted exceedances without identifying specific mitigation measures.

The response does not state what mitigation will actually be used.

Singleton Council notes the proposed mitigation measures.

7.4.12 Surface Water

1. Heavy reliance on future plans

Almost all mitigation is deferred to:

- SWMP – Soil and Water Management Plan
- RVMP – Riparian Vegetation Management Plan

These will be prepared after approval.

Key Risks

Council cannot verify:

- watercourse crossing design
- sediment control standards
- monitoring triggers.

Council preference:

- key design principles locked into consent conditions.

2. Aquatic species risk not directly addressed

Council highlighted habitat for the Southern Purple Spotted Gudgeon.

The response:

- references general riparian plans
- does not identify species-specific protections

Key Risks

Threatened species protection is generic rather than targeted.

Singleton Council notes the proposed mitigation measures, however has raised concerns regarding the provision of adequate water licences to meet the Project's requirements.

7.4.13 Flooding

1. Dismissive response to Council concerns

EnergyCo states “the assessment is considered to represent a balanced assessment” but provides no new modelling or explanation.

Key Risks

Council requested conservative flood assessment, but the response:

- re-asserts the EIS conclusions
- offers no additional analysis.

Singleton Council is seeking a condition of consent that requires the Applicant to identify activities that could affect flooding, include a program to review the adequacy of existing flood mitigation and protection works, including downstream of the Project, describes the measure to minimise flood and manage flood risks, describes the location, function and capacity of flood management structures and describes the measures that would be implemented to maintain these structures over time, such that the construction of the Project does not result in an increased risk of flooding in the vicinity of the Project and downstream.

7.4.14 Soils and Contamination

1. PFAS dismissal based on inferred groundwater direction

EnergyCo states PFAS risk is unlikely because groundwater flows to the north-northeast and away from the corridor.

Key Risks

- PFAS plumes are not always predictable
- reliance on inferred groundwater direction may be weak.

Council may want:

- verification monitoring
- PFAS testing prior to excavation.

Singleton Council notes the proposed mitigation measures.

7.4.15 Aviation Safety

1. No commitment to obstacle lighting

EnergyCo states lighting is not required under Civil Aviation Safety Regulations and that they will consult later.

Key Risks

If Defence or aerodrome operators request lighting later towers may already be designed or installed.

A better approach would be preliminary agreement with aviation stakeholders.

2. Telecommunications Interference

Impact zone is acknowledged but no mitigation detail provided.

EnergyCo acknowledges interference within 131 metres of the transmission easement (AM radio) but mitigation measure TC1 is not described.

Key Risks

Landowners or facilities relying on AM communications may be affected without defined mitigation.

Singleton Council notes the proposed mitigation measures.

7.4.17 Cumulative Traffic Impacts

11. Cumulative Impact Coordination (Major Issue)

Issue 17 – Coordination is voluntary

The key mitigation measure CI1 requires EnergyCo to:
coordinate with other proponents where practicable.

Key Risks

It does not guarantee:

- construction staging coordination
- traffic scheduling

- workforce coordination.

Given the region hosts multiple projects, construction fatigue and road pressure could escalate.

Singleton Council is seeking a condition of consent that requires the Applicant to implement and maintain a local community presence that enables community and other stakeholders to directly contact the Project prior to and during construction, raise concerns regarding impacts felt and requires the Applicant to provide a dedicated mechanism to give feedback to the community on issues raised.